

EXHIBIT 9

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEBRASKA

3 - - -
4 RYSTA LEONA SUSMAN,)
5 Both Individually and)
6 as Legal Guardian of)
7 SHANE ALLEN LOVELAND;) CASE NO. 8:18CV127
8 and JACOB SUMMERS)
9 Plaintiffs,) SUBJECT TO
10 vs.) PROTECTIVE ORDER
11 THE GOODYEAR TIRE &)
12 RUBBER COMPANY,)
13 Defendant.)
14 - - -

15 Videotaped deposition of JAY K.
16 LAWRENCE, a witness herein, called by the
17 Plaintiffs for Examination pursuant to the
18 Federal Rules of Civil Procedure, taken before
19 me, the undersigned, Binnie Denise Purser, a
20 Registered Diplomate Reporter, Certified
21 Realtime Reporter and Notary Public in and for
22 the State of Ohio, pursuant to Notice and
23 agreement of counsel at the offices of Court
24 Reporters, Inc., 221 Springside Drive, Akron,
25 Ohio, on Tuesday, the 5th day of November, 2019,

1 tire internally.

2 Q. And that change or alteration of the
3 tire is what leads to the failure, fair?

4 A. I suppose if by alteration, you mean
5 the changes that I enumerated, then, yes.

6 Q. Like broken belts or whatever else it
7 would be that would be needed to lead to a
8 separation like the one we have, correct?

9 A. It can produce a change that can be
10 very, very small, almost microscopic or it can
11 be larger. There is a whole range of things
12 that the impact can produce inside that tire.

13 Q. Right. Whatever it is, though, in your
14 opinion, based on the questions you have been
15 asked today, for impact to cause -- this is your
16 opinion. I am not saying I agree with it.

17 But is it fair to say that a fair
18 characterization of your opinions as it concerns
19 impact is that when a tire is impacted by
20 something, whatever it may be, something within
21 that tire changes or is altered such that the
22 tire later fails as the result of a tread
23 separation?

24 A. I believe that is what I said, yes.

25 Q. Okay. All right. Now, are you